

1 PHILLIP A. TALBERT
Acting United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,537,494.74
SEIZED FROM CHASE BANK, and

15 APPROXIMATELY \$2,601.24 SEIZED
16 FROM BANK OF AMERICA,

17 Defendants.

2:21-MC-00199-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Ru
19 Cong Ye (“claimant”), by and through their respective counsel, as follows:
20

21 1. On or about May 24, 2021, claimants filed a claim in the administrative forfeiture
22 proceeding with the U.S. Customs and Border Protection (“CBP”) with respect to the Approximately
23 \$1,537,494.74 seized from Chase Bank and Approximately \$2,601.24 seized from Bank of America
(hereafter “defendant assets”), which were seized on August 3, 2020 and August 4, 2020.

24 2. CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to
25 all known interested parties. The time has expired for any person to file a claim to the defendant assets
26 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
27 assets as required by law in the administrative forfeiture proceeding.
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1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
3 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
4 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
5 That deadline was August 22, 2021.

6 4. By Stipulation and Order filed August 23, 2021, the parties stipulated to extend to
7 September 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
9 to forfeiture.

10 5. By Stipulation and Order filed September 22, 2021, the parties stipulated to extend to
11 October 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
13 to forfeiture.

14 6. By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to
15 November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
17 to forfeiture.

18 7. By Stipulation and Order filed November 22, 2021, the parties stipulated to extend to
19 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
21 to forfeiture.

22 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
23 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
25 to forfeiture.

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9. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture shall be extended to January 11, 2022.

Dated: 12/22/21

PHILLIP A. TALBERT
Acting United States Attorney


By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

Dated: 12/22/21

/s/ Seth P. Chazin
SETH P. CHAZIN
Attorney for potential claimant
Ru Cong Ye
(Signature authorized by phone)

IT IS SO ORDERED.

Dated: December 23, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE